

EXHIBIT B

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PRENTICE EARL SANDERS

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JOHN TENNISON,

Plaintiff,

vs.

CITY AND COUNTY OF SAN
FRANCISCO; et al.,

Defendants.

Case No. C04-0574 CW

**INITIAL DISCLOSURES OF
DEFENDANTS PRENTICE EARL
SANDERS, NAPOLEON HENDRIX**

Pursuant to Civil L.R. 16-5, and F.R.C.P. 26(1), Defendants PRENTICE EARL
SANDERS and NAPOLEON HENDRIX (collectively, "Defendants") make the following initial
disclosures:

A. Witnesses

Defendants disclose the following individuals, whose testimony Defendants may use to
support Defendants' claims or defenses in this case:

1. Defendants, each of whom may be contacted through their counsel.
2. Plaintiff John Tennison, whose address and phone number are unknown to Defendants.
3. Antoine Goff, whose address and phone number are unknown to Defendants.
4. Defendant George Butterworth, who may be contacted through his counsel.
5. The persons named in Plaintiff's Complaint, whose addresses and phone numbers are unknown to Defendants. Those persons include but are not limited to: Chante Smith, Pauline Maluina, Masina Fauolo, Officer Michael Lewis, Marc Anthony, Luther Blue, Lovinsky Ricard.
6. Public Defender Jeff Adachi.
7. District Attorney Investigator Ron Leon.
8. Officers Neville Gittens
9. Deputy Public Defender Lerue Grim.

B. Documents and Things

Defendants disclose the following documents which are known to them, which may contain facts or information supporting Defendants' claims or defenses, and which are under Defendants' custody, possession or control:

None at this time.

Defendants incorporate by reference the initial disclosures of Defendant City and County of San Francisco.

C. Computation of Damages

Defendants currently have no information or documents concerning computation of Plaintiff's alleged damages.

1 **D. Certification Pursuant to Local Rule 16-5**

2 To the best of my knowledge, information and belief, formed after a reasonable inquiry,
3 this disclosure is complete and correct as of the time it is made.

4
5 Dated: June 9, 2004

Moscone, Emblidge & Quadra LLP

6
7 By: 

JAMES A. QUADRA

8 Attorneys for Prentice Earl Sanders, Napoleon
9 Hendrix

PROOF OF SERVICE

Case No. C04-0574 CW

I, Laura Helland, declare as follows:

I am a citizen of the United States, over the age of eighteen years and not a party to the within entitled action.

On June 9, 2004, I served the attached:

- **INITIAL DISCLOSURE OF DEFENDANTS PRENTICE EARL SANDERS, NAPOLEON HENDRIX**

on the interested party(ies) named below:

Keker & Van Nest, LLP
Elliot R. Peters
Ethan A. Balogh
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Evan Ackiron
City Attorney
Office of the City Attorney
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180 Harbor Drive, No. 227
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I served the attached document(s) in the manner indicated below:



BY MAIL: I caused true and correct copy(ies) of the above documents to be placed and sealed in envelope(s) addressed to the addressee(s) named above and, following ordinary business practices, placed said envelope(s) at the Law Offices of Moscone, Emblidge & Quadra, LLP, 180 Montgomery, Ste. 1240, San Francisco, California, 94104, for collection and mailing with the United States Postal Service and there is delivery by the United States Post Office at said address(es). In the ordinary course of business, correspondence placed for collection on a particular day is deposited with the United States Postal Service that same day.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed June 9, 2004, at San Francisco, California.


Laura Helland